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July 11, 2024

Via ECF

Honorable Sean H. Lane
United States Bankruptcy Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: Rudolph W. Giuliani
Chapter 11 Case No: 23-12055

Dear Judge Lane:

Please accept this letter as an update on the status of the outstanding administrative claim of Global Data Risk, LLC, the retention of which was approved on April 19, 2024 [Docket No: 189]. The Debtor has been in discussions with the Committee and the Freeman Plaintiff's to reach a resolution. We have not achieved a resolution yet. Discussions are continuing.

In the interim, if the Court is inclined to dismiss the case, it is suggested by the Debtor, the Court dismiss the case but retain jurisdiction to issue appropriate orders in the future resolving this issue.

Respectfully yours,

Gary C. Fischhoff

cc: Rachel Biblo Block, Esq.
James Burbage, Esq.
Aaron E. Nathan, Esq.